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Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**CERTIFICATE OF NO OBJECTION UNDER
28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS
OBJECTIONS SCHEDULED FOR HEARING ON AUGUST 12, 2014**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, filed the following omnibus claims objections (together, the "Claims Objections") with the Court for hearing on August 12, 2014:

- (a) Four Hundred Seventy-Fourth Omnibus Objection to Claims (Reduce and Allow Claims) [ECF No. **45006**]
- (b) Four Hundred Seventy-Fifth Omnibus Objection to Claims (No Liability Claims) [ECF No. **45007**]

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Claims Objections. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator. Accordingly, the Plan Administrator respectfully requests that the proposed orders granting the Claims Objections annexed hereto as Exhibits A and B, which are unmodified since the filing of

the Claims Objections, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: August 5, 2014
New York, New York

/s/ Garrett A. Fail
Garrett A. Fail

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Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

EXHIBIT A

(Proposed Order – ECF No. 45006)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**
: **Debtors.** : **(Jointly Administered)**
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**ORDER GRANTING FOUR HUNDRED SEVENTY-FOURTH
OMNIBUS OBJECTION TO CLAIMS (REDUCE AND ALLOW CLAIMS)**

Upon the four hundred seventy-fourth omnibus objection to claims, dated July 3, 2014 (the “Four Hundred Seventy-Fourth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to reduce and allow the Claims, as more fully described in the Four Hundred Seventy-Fourth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventy-Fourth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Four Hundred Seventy-Fourth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Seventy-Fourth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Seventy-Fourth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Seventy- Fourth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Claim listed on Exhibit 1 annexed hereto is reduced and allowed in the modified amount and priority set forth in the applicable row entitled "Claim as Modified" on Exhibit 1, and any asserted amounts in excess of such amounts are disallowed and expunged; and it is further

ORDERED that the Four Hundred Seventy- Fourth Omnibus Objection to Claims and this Order have no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2014
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

OMNIBUS OBJECTION 474: EXHIBIT 1 - REDUCE AND ALLOW

NAME	CLAIM #	FILED DATE	ASSERTED DEBTOR	AMOUNTS		
				PRIORITY	UNSECURED	TOTAL
1 ADAIR, JOHN	23967	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$1,341,579.00
				CLAIM AS MODIFIED	\$0.00	\$1,352,529.00
2 BALLENTINE, JAMES M., III	23988	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$188,151.00
				CLAIM AS MODIFIED	\$0.00	\$136,048.00
3 BRAMHAM, SHAUN	23989	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$173,414.00
				CLAIM AS MODIFIED	\$0.00	\$155,000.00
4 BUSH, JAMES	23998	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$164,431.00
				CLAIM AS MODIFIED	\$0.00	\$175,381.00
5 CAROL, CLAYTON	23990	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$181,264.00
				CLAIM AS MODIFIED	\$0.00	\$177,000.00
6 CHAN, KENT	23991	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$311,295.00
				CLAIM AS MODIFIED	\$0.00	\$247,000.00
7 DOE, JOCELYN J.	23992	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$383,270.00
				CLAIM AS MODIFIED	\$0.00	\$292,000.00
8 DORFMAN, DAVID A.	23993	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$31,502.00
				CLAIM AS MODIFIED	\$0.00	\$42,452.00
9 FELDKAMP, GEOFFREY F	23994	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,785.00	Undetermined
				CLAIM AS MODIFIED	\$0.00	\$10,785.00
10 GABBAY, MARK	23982	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$1,676,463.00
				CLAIM AS MODIFIED	\$0.00	\$1,500,000.00
11 GLAVAN, JEFFREY L.	23956	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$376,338.00
				CLAIM AS MODIFIED	\$0.00	\$387,288.00

OMNIBUS OBJECTION 474: EXHIBIT 1 - REDUCE AND ALLOW

NAME	CLAIM #	FILED DATE	ASSERTED DEBTOR	AMOUNTS		
				PRIORITY	UNSECURED	TOTAL
12 HAR-EVEN, ITAMAR	23996	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$15,749.00
				CLAIM AS MODIFIED	\$0.00	\$15,749.00
13 JOTWANI,TARUN	23958	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$1,678,622.00
				CLAIM AS MODIFIED	\$0.00	\$1,678,622.00
14 LAIBLE, ROBERT K.	23997	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$446,683.00
				CLAIM AS MODIFIED	\$0.00	\$343,000.00
15 MORRIS, JASON P.	23969	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$44,257.00
				CLAIM AS MODIFIED	\$0.00	\$44,257.00
16 PAPADAKIS, SPYROS N.	23970	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$63,316.00
				CLAIM AS MODIFIED	\$0.00	\$63,316.00
17 RUBIN, CHARLES	23972	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$66,507.00
				CLAIM AS MODIFIED	\$0.00	\$66,507.00
18 SCHIFFMAN, GLENN H.	23973	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$1,074,557.00
				CLAIM AS MODIFIED	\$0.00	\$1,067,000.00
19 SOWINSKI, JOHN A.	23974	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$703.00	Undetermined
				CLAIM AS MODIFIED	\$0.00	\$703.00
20 STEIN, JEFFREY A.	23975	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$261,212.00
				CLAIM AS MODIFIED	\$0.00	\$132,208.30
21 TUNG, SHARON W.	23949	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$71,197.00
				CLAIM AS MODIFIED	\$0.00	\$71,197.00
22 UMLAUF, ERIK	23950	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$94,308.00
				CLAIM AS MODIFIED	\$0.00	\$94,308.00

OMNIBUS OBJECTION 474: EXHIBIT 1 - REDUCE AND ALLOW

NAME	CLAIM #	FILED DATE	ASSERTED DEBTOR	AMOUNTS			
				PRIORITY	UNSECURED	TOTAL	
23 VULAKH, NATALIE SAVIC	23952	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$51,678.00	\$62,628.00
				CLAIM AS MODIFIED	\$0.00	\$60,000.00	\$60,000.00
24 WEISS, AARON J.	23953	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$105,050.00	\$116,000.00
				CLAIM AS MODIFIED	\$0.00	\$35,504.00	\$35,504.00
25 YEE, JACK S.	23954	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$240,474.00	\$251,424.00
				CLAIM AS MODIFIED	\$0.00	\$112,000.00	\$112,000.00
26 ZOLAD, BRYAN C.	23955	9/21/09	Lehman Brothers Holdings Inc.	FILED AMOUNT SUBJECT TO OBJECTION	\$10,950.00	\$36,719.00	\$47,669.00
				CLAIM AS MODIFIED	\$0.00	\$11,000.00	\$11,000.00
TOTAL AMOUNT SUBJECT TO OBJECTION				\$274,288.00	\$8,968,536.00	\$9,242,824.00	
TOTAL CLAIMS AS MODIFIED				\$0.00	\$8,270,854.30	\$8,270,854.30	

EXHIBIT B

(Proposed Order – ECF No. 45007)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (SCC)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE FOUR HUNDRED SEVENTY-FIFTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred seventy-fifth omnibus objection to claims, dated July 3, 2014 (the “Four Hundred Seventy-Fifth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance of the Claims, all as more fully described in the Four Hundred Seventy-Fifth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventy-Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Seventy-Fifth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Seventy-Fifth

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Seventy-Fifth Omnibus Objection to Claims.

Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Seventy-Fifth Omnibus Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged, with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2014
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

OMNIBUS OBJECTION 475: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 CHINA FUND CAYMAN LTD.	08-13600 (SCC)	LB 745 LLC	09/21/2009	33419	Undetermined	Undetermined	No Liability
2 CHINA FUND CAYMAN LTD.	08-13885 (SCC)	Lehman Brothers Commodity Services Inc.	09/21/2009	33420	Undetermined	Undetermined	No Liability
3 CHINA FUND CAYMAN LTD.	08-13664 (SCC)	PAMI Statler Arms LLC	09/21/2009	33421	Undetermined	Undetermined	No Liability
4 CHINA FUND CAYMAN LTD.	08-13899 (SCC)	Lehman Brothers Derivative Products Inc.	09/21/2009	33422	Undetermined	Undetermined	No Liability
5 CHINA FUND CAYMAN LTD.	08-13893 (SCC)	Lehman Brothers OTC Derivatives Inc.	09/21/2009	33423	Undetermined	Undetermined	No Liability
6 CHINA FUND CAYMAN LTD.	08-13888 (SCC)	Lehman Brothers Special Financing Inc.	09/21/2009	33424	Undetermined	Undetermined	No Liability
7 CHINA FUND CAYMAN LTD.	08-13902 (SCC)	Lehman Brothers Financial Products Inc.	09/21/2009	33425	Undetermined	Undetermined	No Liability
8 CHINA FUND CAYMAN LTD.	08-13901 (SCC)	Lehman Brothers Commercial Corporation	09/21/2009	33426	Undetermined	Undetermined	No Liability
9 CHINA FUND CAYMAN LTD.	08-13900 (SCC)	Lehman Commercial Paper Inc.	09/21/2009	33427	Undetermined	Undetermined	No Liability
10 CHINA FUND CAYMAN LTD.	08-13904 (SCC)	Lehman Scottish Finance L.P.	09/21/2009	33528	Undetermined	Undetermined	No Liability

OMNIBUS OBJECTION 475: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
11 CHINA FUND CAYMAN LTD.	08-13907 (SCC)	CES Aviation IX LLC	09/21/2009	33529	Undetermined	Undetermined	No Liability
12 CHINA FUND CAYMAN LTD.	08-13906 (SCC)	CES Aviation V LLC	09/21/2009	33530	Undetermined	Undetermined	No Liability
13 CHINA FUND CAYMAN LTD.	09-10108 (SCC)	Luxembourg Residential Properties Loan Finance S.a.r.l.	09/22/2009	33531	Undetermined	Undetermined	No Liability
14 CHINA FUND CAYMAN LTD.	08-13905 (SCC)	CES Aviation LLC	09/22/2009	33532	Undetermined	Undetermined	No Liability
15 CHINA FUND CAYMAN LTD.	09-10137 (SCC)	BNC Mortgage LLC	09/22/2009	33533	Undetermined	Undetermined	No Liability
16 CHINA FUND CAYMAN LTD.	09-10558 (SCC)	Structured Asset Securities Corporation	09/22/2009	33534	Undetermined	Undetermined	No Liability
17 CHINA FUND CAYMAN LTD.	08-13908 (SCC)	East Dover Limited	09/22/2009	33535	Undetermined	Undetermined	No Liability
18 CHINA FUND CAYMAN LTD.	09-10560 (SCC)	LB Rose Ranch LLC	09/21/2009	33537	Undetermined	Undetermined	No Liability
19 CHINA FUND CAYMAN LTD.	09-12516 (SCC)	LB 2080 Kalakaua Owners LLC	09/21/2009	33538	Undetermined	Undetermined	No Liability
20 CHINA FUND LP	08-13905 (SCC)	CES Aviation LLC	09/21/2009	33456	Undetermined	Undetermined	No Liability

OMNIBUS OBJECTION 475: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
21 CHINA FUND LP	08-13906 (SCC)	CES Aviation V LLC	09/21/2009	33457	Undetermined	Undetermined	No Liability
22 CHINA FUND LP	08-13907 (SCC)	CES Aviation IX LLC	09/21/2009	33458	Undetermined	Undetermined	No Liability
23 CHINA FUND LP	08-13908 (SCC)	East Dover Limited	09/21/2009	33459	Undetermined	Undetermined	No Liability
24 CHINA FUND LP	09-10108 (SCC)	Luxembourg Residential Properties Loan Finance S.a.r.l.	09/21/2009	33460	Undetermined	Undetermined	No Liability
25 CHINA FUND LP	09-10137 (SCC)	BNC Mortgage LLC	09/21/2009	33461	Undetermined	Undetermined	No Liability
26 CHINA FUND LP	09-10558 (SCC)	Structured Asset Securities Corporation	09/21/2009	33462	Undetermined	Undetermined	No Liability
27 CHINA FUND LP	09-10560 (SCC)	LB Rose Ranch LLC	09/21/2009	33463	Undetermined	Undetermined	No Liability
28 CHINA FUND LP	09-12516 (SCC)	LB 2080 Kalakaua Owners LLC	09/21/2009	33464	Undetermined	Undetermined	No Liability
29 CHINA FUND LP	08-13888 (SCC)	Lehman Brothers Special Financing Inc.	09/21/2009	33484	Undetermined	Undetermined	No Liability
30 CHINA FUND LP	08-13664 (SCC)	PAMI Statler Arms LLC	09/21/2009	33485	Undetermined	Undetermined	No Liability

OMNIBUS OBJECTION 475: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
31 CHINA FUND LP	08-13885 (SCC)	Lehman Brothers Commodity Services Inc.	09/21/2009	33486	Undetermined	Undetermined	No Liability
32 CHINA FUND LP	08-13600 (SCC)	LB 745 LLC	09/21/2009	33487	Undetermined	Undetermined	No Liability
33 CHINA FUND LP	08-13893 (SCC)	Lehman Brothers OTC Derivatives Inc.	09/21/2009	33488	Undetermined	Undetermined	No Liability
34 CHINA FUND LP	08-13899 (SCC)	Lehman Brothers Derivative Products Inc.	09/21/2009	33489	Undetermined	Undetermined	No Liability
35 CHINA FUND LP	08-13900 (SCC)	Lehman Commercial Paper Inc.	09/21/2009	33490	Undetermined	Undetermined	No Liability
36 CHINA FUND LP	08-13901 (SCC)	Lehman Brothers Commercial Corporation	09/21/2009	33516	Undetermined	Undetermined	No Liability
37 CHINA FUND LP	08-13902 (SCC)	Lehman Brothers Financial Products Inc.	09/21/2009	33517	Undetermined	Undetermined	No Liability
38 CHINA FUND LP	08-13904 (SCC)	Lehman Scottish Finance L.P.	09/21/2009	33518	Undetermined	Undetermined	No Liability
TOTAL					\$0.00	\$0.00	